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Atorneys for Plaintiff
MATT G. PRINES

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

12 MATT G. PRINES) Case No.: 2:16-cv-01457-JCM-PAL
13 Plaintiff,)
14 v.) STIPULATION TO EXTEND TIME
15 NANCY A. BERRYHILL, Acting) TO FILE MOTION FOR REVERSAL
Commissioner of Social Security.) AND/OR REMAND
16 Defendant.) (THIRD REQUEST)
17)
18)
19)

Plaintiff Matt G. Prines and Defendant Nancy A. Berryhill, Acting
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Commissioner of Social Security, through their undersigned attorneys, stipulate,
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subject to this court's approval, to extend the time from April 10, 2017 to April 17,
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2017 for Plaintiff to file Plaintiff's Motion for Reversal and/or Remand; and that
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Defendant shall have until May 17, 2017, to file her opposition, if any is
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forthcoming. Any reply by plaintiff will be due June 6, 2017. This is Plaintiff's
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third request.
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1 Counsel has recently reassigned this case internally in order to avoid further
2 delay in this matter. An extension of time is needed as the spouse of the associate
3 in Counsel's firm who this matter was previous assigned recently passed away.
4 Due to the sensitive nature of the situation, Counsel has previously refrained from
5 reassigning the matter.

6 The matter has now been reassigned and Counsel assures the Court that the
7 Motion will be filed on or before April 17, 2017. Counsel sincerely apologizes to
8 the court for any inconvenience this may have had upon it or its staff.

10 DATE: April 10, 2017 Respectfully submitted,
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13 BY: _____
Cyrus Safa
Attorney for plaintiff Mr. Matt G. Prines, Jr.

16 DATE: April 10, 2017 Daniel G. Bogden
United States Attorney

DATED: April 14, 2017

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

1
2 **CERTIFICATE OF SERVICE**
3 **FOR CASE NUMBER 2:16-CV-01457-JCM-PAL**
4

5 I hereby certify that I electronically filed the foregoing with the Clerk of the
6 Court for this court by using the CM/ECF system on April 10, 2017.
7

8 I certify that all participants in the case are registered CM/ECF users and
9 that service will be accomplished by the CM/ECF system.
10

11 */s/ Cyrus Safa*
12 _____
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14 Cyrus Safa
15 Attorneys for Plaintiff
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